

Case Number: 18-cv-05582-(JBW)-(PK)

PROPOSED DISCOVERY PLAN			
	DONE	NOT APPLICABLE	DATE
<b>A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held			
2. Rule 26(a)(1) disclosures exchanged			By 12/12/18
3. Requests made:			
a. Medical records authorization			By 12/12/18
b. Section 160.50 releases for arrest records		X	
c. Identification of John Doe/Jane Doe defendants		X	
d. Proposed Stipulation of Confidentiality			By 12/12/18
4. Procedures for producing Electronically Stored Information (ESI) discussed			By 12/12/18
<b>B. SETTLEMENT</b>			
1. Plaintiff to make settlement demand			12/31/2018
2. Defendant to make settlement offer			1/11/2019
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date to be completed)		X	
4. Settlement Conference (proposed date)			4/10/2019 (subject to Plaintiff's availability)
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties or amend pleadings			1/21/18
2. Initial documents requests and interrogatories			2/18/19
3. All fact discovery to be completed (including disclosure of medical records)			5/29/19
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed			6/3/19

5. Expert discovery (only if needed)		Check here if not applicable <input type="checkbox"/>	
Plaintiff expert proposed field of expertise:			
Defendant expert proposed field of expertise:			
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
a. Case-in-chief expert report due			6/30/19
b. Rebuttal expert report due			7/29/19
c. Depositions of experts to be completed			8/26/19
6. Completion of ALL DISCOVERY			9/4/19
7. Joint status report certifying close of all discovery and indicating whether dispositive motion is anticipated			9/10/19
8. If District Judge requires Pre-Motion Conference, date to make request		X	
9. If District Judge does not require Pre-Motion Conference, date to submit briefing schedule			9/10/19
10. Joint Pre-Trial Order due (if no dispositive motion filed)			9/30/19
<b>D. CONSENT TO MAGISTRATE JUDGE JURISDICTION</b>			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</b>			
1. Motion for collective action certification in FLSA cases		X	
a. Response due		X	
b. Reply due		X	
2. Motion for Rule 23 class certification		X	
a. Response due		X	
b. Reply due		X	

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

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**PEGGY KUO**  
 United States Magistrate Judge

\_\_\_\_\_  
**Date**